

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

ILLINOIS  
COMMERCE COMMISSION

2005 JUN 26 A 11:26

**SOUTHWESTERN ELECTRIC COOPERATIVE, )**  
**INC. and ILLINOIS POWER )**  
**COMPANY d/b/a AMEREN IP )**

CHIEF CLERK'S OFFICE

**Joint petition for approval of request to serve )**  
**pursuant to Section 9 of the Service Area )**  
**Agreement dated August 20, 1970, )**  
**between Southwestern Electric Cooperative, )**  
**Inc. and Illinois Power Company, d/b/a )**  
**Ameren IP )**

Docket No. 06-0467

***STIPULATED MOTION FOR A PAPER HEARING***

NOW COME the parties, Illinois Power Company d/b/a AmerenIP ("AmerenIP"), by Brown, Hay & Stephens, LLP, Scott C. Helmholtz and Richard S. Wolters, and Southwestern Electric Cooperative, Inc. ("Southwestern") by Kerry Sloan, its Chief Executive Officer, and hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill.Admin.Code §200.525. In support of this request, the parties state as follows:

1. The parties have filed a Joint Petition under Section 9 of the previously approved Service Area Agreement between the parties.

2. Attached to the Petition is a true and correct copy of a Customer Request to Serve (marked for identification purposes as "Joint Petition Exhibit A") and a true and correct copy of an Electric Supplier Request to Serve made pursuant to Section 9 of the Service Area Agreement (marked for identification purposes as "Joint Petition Exhibit B").

3. The Rules of Practice of the Illinois Commerce Commission permit the parties and Staff participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process described as a Paper Hearing (83 Ill.Admin.Code §200.525(a)). Such a stipulation may be filed at any time prior to the date the Administrative Law Judge marks the case Heard and Taken (83

Ill.Admin.Code §200.525(d)). The stipulation is subject to the approval of all parties, Staff and the Administrative Law Judge (83 Ill.Admin.Code §200.525(b)).

4. The parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.

5. Attached hereto and marked for identification purposes as Joint Stipulation Exhibit A ("Stipulation"), is the Stipulation to be signed by the Staff member in the event one is assigned to this docket prior to the preparation of an order for the Illinois Commerce Commission's consideration. In the event no Staff member is assigned, both signatories to this Stipulation expressly waive the necessity of having Staff review this petition and/or file a Staff Stipulation.

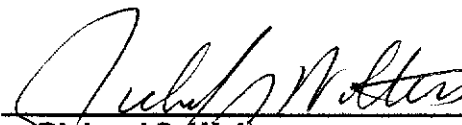
6. An affidavit supporting the Stipulation and Exhibits is attached hereto and marked for identification as Joint Stipulation Exhibit B.


7. AmerenIP prepared and circulated a Draft Order, attached to this Joint Stipulation as Joint Stipulation Exhibit C.

WHEREFORE, the parties request that this proceeding be conducted as a Paper Hearing and that an Order substantially similar to the Draft Order attached to the Joint Petition as Joint Stipulation Exhibit C be entered.

**Illinois Power Company**  
**d/b/a AmerenIP**

**Southwestern Electric Cooperative, Inc.**

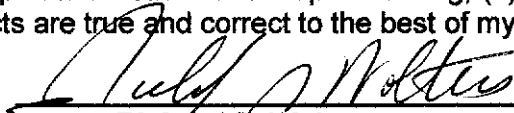
By:   
**Richard S. Wolters**  
Brown, Hay & Stephens, LLP  
205 South Fifth Street, Suite 700  
P.O. Box 2459  
Springfield, IL 62705  
Telephone: (217) 544-8491  
Facsimile: (217) 241-3111  
[rwolters@bhslaw.com](mailto:rwolters@bhslaw.com)

By:   
**Kerry Sloan**  
Chief Executive Officer  
525 U.S. Route 40  
P.O. Box 549  
Greenville, IL 62246  
[ksloan@sweci.com](mailto:ksloan@sweci.com)

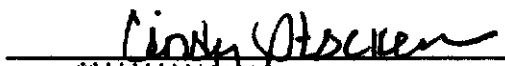
State of Illinois )  
 ) SS.  
County of Sangamon )

**Verification**

I, **Richard S. Wolters**, certify that (1) I am an attorney for Illinois Power Company d/b/a AmerenIP; (2) I have read the attached Stipulated Motion for a Paper Hearing; (3) I am familiar with the facts stated herein; and, (4) the facts are true and correct to the best of my knowledge.

  
Richard S. Wolters

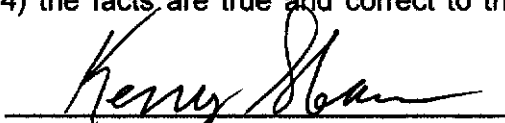
Subscribed and sworn to before me this 25<sup>th</sup> day of JUNE, 2006.

  
Notary Public  
OFFICIAL SEAL  
CINDY STOCKER  
NOTARY PUBLIC, STATE OF ILLINOIS  
MY COMMISSION EXPIRES 5-11-2009

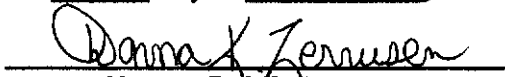
State of Illinois )  
 ) SS.  
County of Bond )

**Verification**

I, **Kerry Sloan**, certify that (1) I am the Chief Executive Officer of Southwestern Electric Cooperative, Inc.; (2) I have read the attached Stipulated Motion for a Paper Hearing; (3) I am familiar with the facts stated herein; and, (4) the facts are true and correct to the best of my knowledge.

  
Kerry Sloan

Subscribed and sworn to before me this 20<sup>th</sup> day of June, 2006.

  
Notary Public  
OFFICIAL SEAL  
DONNA K. ZERRUSEN  
NOTARY PUBLIC, STATE OF ILLINOIS  
My Commission Expires 10-01-2008